



April 23, 2025

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VIA ECF

Hon. Arun Subramanian
 United States District Judge
 Southern District of New York
 500 Pearl Street
 New York, NY 10007

Re: *United States v. Combs*, 24-cr-542 (AS)

Dear Judge Subramanian:

On behalf of defendant Sean Combs, we write to object to the government’s “supplemental letter” submitted this afternoon regarding the proposed testimony of Dawn Hughes as an improper surreply and motion for reconsideration. Mr. Combs’s motion in limine to preclude Dr. Hughes’s testimony has already been fully briefed and fully argued.

The Court heard extensive oral argument on the motion at the conference held on April 18, 2025, and indicated it intended to restrict Dr. Hughes’s testimony to two limited sections of her disclosure, and to prohibit her from using the term “coercive control.” *See* 4/19/25 Tr. 51. The Court indicated that it intended to issue a written decision this week. *See id.* The government then immediately sought to re-argue the point and expand the scope of her testimony. *See id.* at 52-53. In response, the Court provided some clarification but instructed the parties that they should await the Court’s written ruling regarding Dr. Hughes’s testimony, and that: “If something that I say is unclear and you want clarity, all you have to do is ask.” *Id.* at 53. Instead, the government seeks to re-argue its position, despite having had a full opportunity to brief and argue the motion already, and without presenting any “matters or controlling decisions” that the Court “has overlooked.” Local Civil Rule 6.3; *United States v. Yannotti*, 457 F. Supp. 2d 385, 389 (S.D.N.Y. 2006) (applying rule and collecting criminal cases).

The Court should decline to even consider the government’s post-argument letter or entertain its belated re-arguments. However, if the Court is inclined to consider the government’s letter, in light of the other upcoming deadlines in this case, we respectfully request leave to file a response to the substance of the letter by April 28, 2025.

Respectfully submitted,

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